



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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JAN 25 2016

Ref: 8ENF-AT

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Todd Brichacek
Senior Vice President & Site Manager, Green River Operations
Solvay Chemicals, Inc.
P.O. Box 1167
Green River, WY 82935

Re: Follow-up to Section 114(a) Information Request for the Solvay Chemicals, Inc., Green River Soda Ash Facility in Wyoming; Capital Projects Identified

Dear Mr. Brichacek:

The United States Environmental Protection Agency received letters dated July 7 and August 15, 2014 from Solvay Chemicals, Inc., Green River Soda Ash Facility in Wyoming (Solvay). These letters were provided in response to the EPA's April 28, 2014, information request (2014 Request) pursuant to section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). The 2014 Request was to evaluate Solvay's compliance with the Act's requirements regarding work performed on emission units at the Facility.

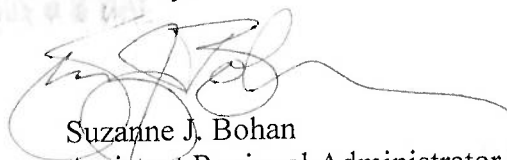
The EPA has identified a number of questions to clarify the information Solvay provided in its responses. A narrowed list of capital projects and clarification questions are provided in Enclosure 1 to this letter. Solvay's response to the entirety of this request is due within **thirty (30) days** of its receipt of this letter.

It is important that Solvay respond to this follow-up information request. Failure to comply may result in administrative and civil penalties of up to \$37,500 per day of violation as provided by section 113(d) of the Act, 42 U.S.C. § 7413(d). Please be further advised that the submission of false, fictitious or fraudulent statements or representations may subject you to criminal penalties under section 113(c) of the Act, 42 U.S.C. §§ 1001 and 1341.

This follow-up request is an addendum to the 2014 Request and is also made pursuant to section 114(a) of the Act, 42 U.S.C. § 7414(a). Please refer to the 2014 Request for applicable instructions, definitions, certification requirements, and business confidentiality claim assertion and substantiation requirements.

If you have any technical questions concerning this request, please contact Joe Wilwerding, Environmental Engineer, at (303) 312-6729. Any questions from Solvay's legal counsel, should be directed to Lauren Hammond, EPA Enforcement Attorney at (303) 312-7081.

Sincerely,



Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

Enclosure

cc: Nancy Vehr, Wyoming Department of Environmental Quality
Lauren Hammond, R8ENF-L
Joe Wilwerding, R8ENF-AT
Greg Fried, EPA-Headquarters



ENCLOSURE 1 – MAY CONTAIN CONFIDENTIAL BUSINESS INFORMATION

1. The EPA has reviewed the list of capital projects provided by Solvay in its previous responses, and has identified a narrowed list of projects. Please provide all related documents that support Solvay's response to questions 6 and 7 of the 2014 Request. The identified list of projects are as follows:

Project Name	Bates/File Number(s)
CA-2 Bucket Elevator	SOLVAY5_CBI_000006-SOLVAY5_CBI_000006
Calciner Conversion to Coal	SOLVAY5_CBI_000008-SOLVAY5_CBI_000008
Star Strike 2	SOLVAY5_CBI_000009-SOLVAY5_CBI_000014
Gas Efficiency	SOLVAY5_CBI_000018-SOLVAY5_CBI_000018
Calciner (CA-3) Bucket Elevator	SOLVAY5_CBI_000019-SOLVAY5_CBI_000020
Upgrade Calciner Discharge	SOLVAY5_CBI_000021-SOLVAY5_CBI_000021
Upgrade CA-1 Discharge	SOLVAY5_CBI_000022-SOLVAY5_CBI_000024
CA-1 Bucket Elevator	SOLVAY5_CBI_000022-SOLVAY5_CBI_000024
CA-1 Upgrade	SOLVAY5_CBI_000025-SOLVAY5_CBI_000027
Gas Boiler Addition	This project was not listed in the Solvay 114 response, but was listed in a PSD permit (PSD-WY-000004-2012.001) for the site.

2. Describe the expansion that occurred at the Facility, which was referenced in Solvay's response to item 1 of the 2014 Request, as the following: "The SSAEJV [Solvay Soda Ash Expansion Joint Venture] was organized pursuant to a General Partnership Agreement between Solvay Minerals, Inc., and AG Soda Corporation dated July 16, 1999 in connection with an expansion at the Facility" [Bates SOLVAY_000004].
3. Provide the "Construction Management Agreement between Solvay Soda Ash Expansion Joint Venture and Solvay Minerals, Inc." [Bates SOLVAY_000005].
4. Provide documents related to items 4, 5, 6, and 7 of the 2014 Request for the GRIV soda ash expansion referenced in SOLVAY5_CBI_000009-SOLVAY5_CBI_000014:

The Executive Committee recommends the 1st phase (400 ksht/y) of the GRIV soda ash expansion. This project consists with regard to the surface facilities essentially in the following :

- installing a 4th production line
- integrating this new line into the existing units
- increasing the trona and dense soda storage capacity
- changing the preparation of the mineral in the framework of putting the "long wall" unit into operation
- revamping the existing AMRA and automating all of the soda ash plant.

5. The table below lists the original calciner design capacities and the current operating capacities as reported by Solvay in response to item 2 of the 2014 Request [Bates SOLVAY2_000001]. If the information provided by Solvay has changed since its 2014 responses, please update that information. Additionally, for any calciner with a capacity increase since its original design, please provide the following:

- a. the dates of each capacity increase after the calciner's original design;
- b. the new capacity of the calciner after the increase; and
- c. a reference to any permit modifications made to capture the capacity increase.

EPA Request 2: For Each Calciner at the Facility, Provide:

Question	CA-1	CA-2	CA-3	CA-4
a) Emission Unit ID No.	AQD #17	AQD #17	AQD #48	AQD #80
b) Date operation began	1982	1982	1992	2000
c) Original design capacity (tons/hour of ore feed and tons/hour of calcined material for monohydrate calciners)	114 tph	114 tph	200 tph	275 tph
d) Current operating capacity (tons/hour of feed and tons per hour of calcined material for monohydrate calciners)	162 tph	162 tph	200 tph	325 tph

6. In Solvay's response to item 8 of the 2014 Request, Solvay stated, "Consistent with a conversation between Solvay's outside counsel and Mr. Buenning of EPA, and as confirmed by email on May 22, 2014, Solvay is only providing the results of the testing at this time and not the backup reports accompanying the results. If EPA would like to see any of the backup reports, they will be provided in a timely manner." [SOLVAY_000010]. Please provide the backup reports.

7. For air pollution testing of Ammonia, Carbon Monoxide, Particulate, Gaseous PM, Condensable PM, Nitrogen Oxides, and Sulfur Dioxide listed in Solvay's response to item 9 of the 2014 Request, and for any air pollution testing of these pollutants performed since Solvay's response to item 9 of the 2014 Request, provide the full report from each test.

8. Provide the **value** used in the calculation of “Reference Method, “Operating Hours,” or “lb/ton VOC,” as referenced by Solvay in responses to item 10.h. of the 2014 Request by way of an explanation for how pollutant emissions were estimated.
9. In its response to item 10 of the 2014 Request, Solvay provided raw ore feed for all calciners combined from January 1995 to December 1997. Solvay responded that the data for each individual calciner does not exist. Please provide estimated feed data information for each individual calciner from January 1995 to December 1997, based on best available data.
10. In addition to the summary results of all stack tests for PM, PM10, and PM2.5 that was provided in Solvay’s response to item 11 of the 2014 Request, provide the summary results for all stack tests for Carbon Monoxide, Nitrogen Oxide, and Sulfur Dioxide.
11. Provide, in electronic format (Excel or other comma delimited format), for each individual calciner, from 1995 to present, the monthly average wet and dry volume of process gas vented from each calciner to the atmosphere.